

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

DAE SUNG KIM,

Defendant.

) Criminal No.
)
) Violation:
)
) Count One: Attempted Coercion and Enticement
) (18 U.S.C. § 2422(a))
)
) Forfeiture Allegation:
) (18 U.S.C. § 2428(a))
)
)
)

INFORMATION

COUNT ONE

Attempted Coercion and Enticement
(18 U.S.C. § 2422(a))

The United States Attorney charges:

From on or about March 8, 2024, through on or about October 11, 2024, in the District of Massachusetts and elsewhere, the defendant,

DAE SUNG KIM,

did attempt to persuade, induce or entice any individual – to wit, Person 1 – to travel in interstate commerce with the intent that Person 1 engage in prostitution and in any sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2422(a).

FORFEITURE ALLEGATION
(18 U.S.C. § 2428(a))

The United States Attorney further alleges:

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 2422, set forth in Count One, the defendant,

DAE SUNG KIM,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2428(a), any property, real or personal, used or intended to be used to commit or to facilitate the commission of such offense, or any property, real or personal, that constitutes or is derived from proceeds obtained, directly or indirectly, as a result of such offense. The property to be forfeited includes, but is not limited to, the following asset:

a. iPhone 15 Pro (Serial # CM9TM4Y3WY).

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 2428(a) as a result of any act or omission of the defendant—

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 2428(a).

JOSHUA S. LEVY
UNITED STATES ATTORNEY

By: *Brendan O'Shea*
BRENDAN D. O'SHEA
Assistant United States Attorney
JAMES J. NAGELBERG
Special Assistant United States Attorney